

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

2005 FEB 25 P 3:15

BOSTON ARCHDIOCESAN
TEACHERS' ASSOCIATION

U.S. DISTRICT COURT
DISTRICT OF MASS

DOCKET NO.
04-11197MLW

v.

ARCHDIOCESAN CENTRAL HIGH SCHOOLS, INC.,
ARCHBISHOP SEAN P. O'MALLEY, AS A
CORPORATION SOLE, THE ROMAN CATHOLIC
ARCHDIOCESE OF BOSTON, NORTH CAMBRIDGE
CATHOLIC HIGH SCHOOL, INC., CATHEDRAL
HIGH SCHOOL, INC., MATIGNON HIGH SCHOOL,
INC., POPE JOHN XXIII HIGH SCHOOL, INC.,
BISHOP FENWICK HIGH SCHOOL, INC.,
CARDINAL SPELLMAN HIGH SCHOOL,
INC., MARIAN HIGH SCHOOL, INC.,
AND ARCHBISHOP WILLIAMS HIGH
SCHOOL, INC.

JOINT STATEMENT AND PROPOSED PRETRIAL SCHEDULE

Pursuant to Fed. R. Civ. P. 26(f), Local Rule 16.1, and the Court's Notice of Scheduling Conference, the parties have conferred and propose as an agenda for the scheduling conference the consideration of the discovery and motion schedule set forth below.

1. Discovery
 - A. Written Discovery: All written discovery completed by 16 months from the date of the Court's ruling on the pending Motions to Dismiss.
 - B. Depositions: All depositions completed by 18 months from the date of the Court's ruling on the pending Motions to Dismiss.
 - C. The parties contemplate extensions of these discovery time periods if there are motions to compel, motions for protective orders, or other complicating circumstances.
2. Rule 56 Motions: Filed no later than 20 months from the date of the court's ruling on the pending Motions to Dismiss, absent a delay in discovery.

3. Settlement Proposal: On February 22, 2005, Plaintiff submitted a written settlement proposal to Defendants. Defendants will respond to the offer at the scheduling conference.
4. Local Rule 16.4 Certifications: Each party is filing its own certification with the Court.
5. Consent to magistrate judge: The parties do not consent to a trial by magistrate judge.

PLAINTIFF,
BOSTON ARCHDIOCESAN
TEACHERS ASSOCIATION

BY ITS ATTORNEYS,

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DEFENDANTS,
ARCHDIOCESAN CENTRAL
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CATHOLIC HIGH SCHOOL, INC., CATHEDRAL HIGH
SCHOOL, INC., MATIGNON HIGH SCHOOL, INC.,
POPE JOHN XXIII HIGH SCHOOL, INC., BISHOP
FENWICK HIGH SCHOOL, INC., CARDINAL
SPELLMAN HIGH SCHOOL, INC., MARIAN HIGH
SCHOOL, INC., AND ARCHBISHOP WILLIAMS HIGH
SCHOOL, INC.,
BY THEIR ATTORNEYS.

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DEFENDANT,
THE ROMAN CATHOLIC ARCHBISHOP
OF BOSTON, A CORPORATION SOLE,
BY ITS ATTORNEYS,

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